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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF THOMAS J.
PARDINI IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS OFFERS OF
PROOF REGARDING REASONABLE
ROYALTY DAMAGES AND
DISCLOSURE OF THE ASSERTED
TRADE SECRETS (DKT. 2189)**

1 I, Thomas J. Pardini, declare as follows:

2 1. I am a member of the Bar of the State of California and an attorney at the law firm
3 of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal
4 knowledge and if called as a witness, I could and would competently testify to the matters set
5 forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion
6 to File Under Seal Its Offers of Proof Regarding Reasonable Royalty Damages and Disclosure of
7 the Asserted Trade Secrets (Dkt. 2189).

8 2. I have reviewed the following documents and confirmed that only the portions
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 1	Entire Document
Exhibit 2	Blue Highlights

14 3. The entirety of Exhibit 1 contains highly confidential information regarding
15 various components of Uber's LiDAR sensors, including engineering drawings. This information
16 is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure
17 of this information could allow competitors and counterparties to gain insight into the technical
18 details of Uber's LiDAR sensors, allowing them to tailor their own technical development to the
19 detriment of Uber.

20 4. The blue highlights added to the attached Exhibit 2 contain highly confidential
21 information regarding Uber's business strategy, company expenditures outside of the self-driving
22 car field, current and potential cost models, draft financial forecasts based on hypothetical
23 assumptions, and estimated development timelines. The blue highlights also contain highly
24 confidential information regarding third-party vendors with business agreements subject to
25 NDAs, including pricing information. This information is not publicly known, and its
26 confidentiality is strictly maintained. I understand that disclosure of this information would give
27 competitors knowledge into elements of Uber's business strategy, financial estimates regarding
28

1 various elements of Uber's business, and confidential vendors. Uber's competitive standing
2 could be significantly harmed.

3 5. Defendants' request to seal is narrowly tailored to the portions of Waymo's Offers
4 of Proof that merit sealing.

5 I declare under penalty of perjury that the foregoing is true and correct. Executed this
6 16th day of November, 2017 at San Francisco, California.

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8 /s/ Thomas J. Pardini
9 Thomas J. Pardini
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